

# ***Wireless Strategies Inc.***

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# WTB Docket 07-121

- It has been over two years since the Commission issued a Public Notice inviting comments on WSI's request for a Declaratory Ruling.

# WTB Docket 07-121

- As the result of the exhaustive process (over fifty comments and ex parte notices and numerous meetings) the evidence clearly shows the following:

# Rule 101.115

*“The rule on its face does not mandate a specific size of antenna. Rather, it specifies certain technical parameters – maximum beamwidth, minimum antenna gain, and minimum radiation suppression – that, depending on the state of technology at any point in time, directly affect the size of a compliant antenna....”*

*Report and Order in WT Docket NO. 07-54, at Page 4  
(adopted September 7, 2007)*

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# Rule 101.115 cont...

- ❖ Rule 101.115 does not specify how the Electrical Requirements are met\*

*\* -By not specifying HOW, the Commission allows and encourages industry to innovate.*

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# Rule 101.115 cont...

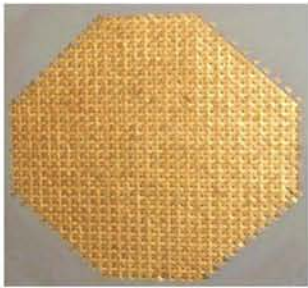
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## Transceiver and Radiator Element's Location and RPE Not Specified for a Dish Antenna



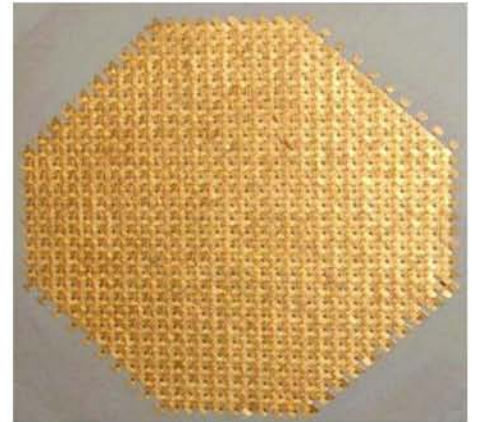
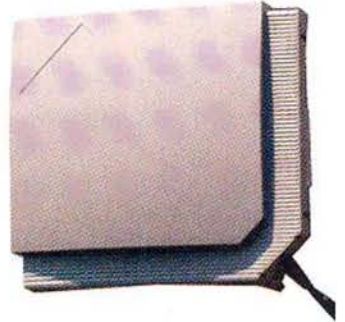
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# Transceiver and Radiator Element's Location and RPE Not Specified for a Multi-Array Antenna



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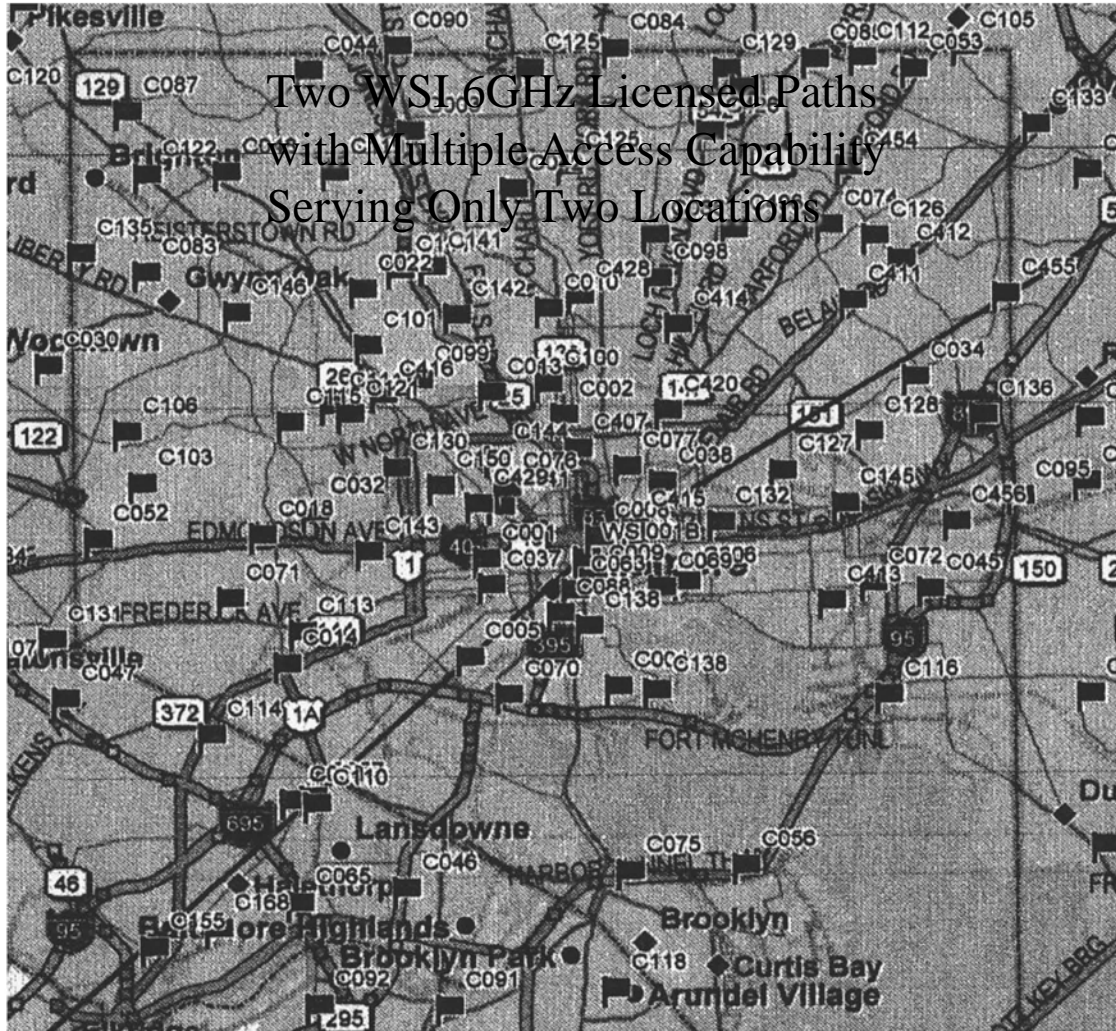
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# Rule 101.103

- ❖ Rule 101.103 is necessary because Around Every Licensed Station there are Locations where a New Applicant attempting to Coordinate a Station would Fail as the Proposed Station would either Cause or Receive Harmful Interference.
- ❖ Although some of these locations could have been used by the Licensees they have not. The Coordinated Spectrum has been Wasted.

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# Baltimore



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# DREs Will Cause No Harm

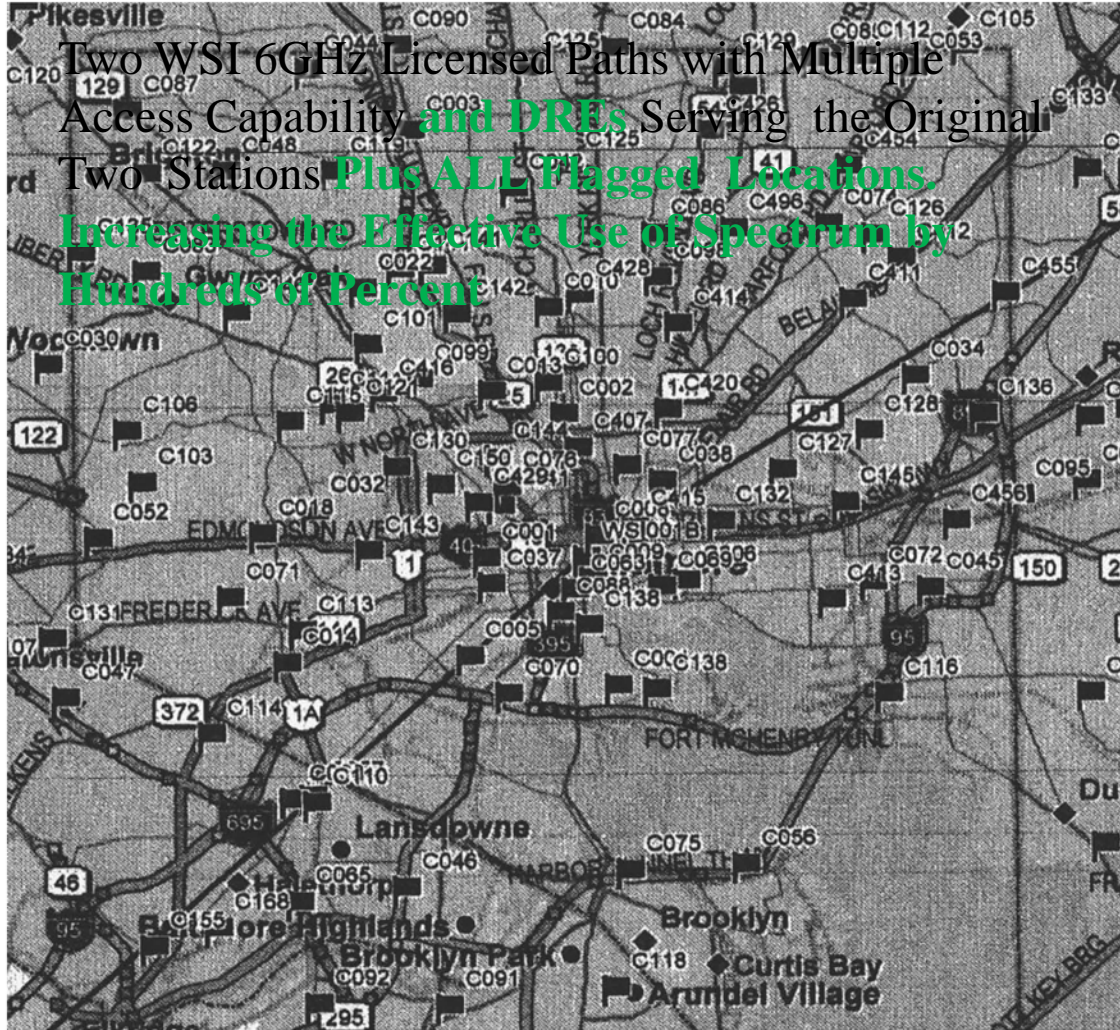


# Through Innovation

- ❖ Through Innovation it is now possible for Licensees to Dramatically Increase the Effective Use of the Licensed Spectrum by Putting into Productive Use some of the heretofore Unused Locations by:
  1. Upgrading the Licensed Station's Transceivers to have Multiple Access Capabilities
  2. Deploying Distributed Radiating/Receiving Elements (DREs) Around the Licensed Stations

# Baltimore

Two WSI 6GHz Licensed Paths with Multiple  
Access Capability and DREs Serving the Original  
Two Stations Plus ALL Flagged Locations.  
Increasing the Effective Use of Spectrum by  
Hundreds of Percent



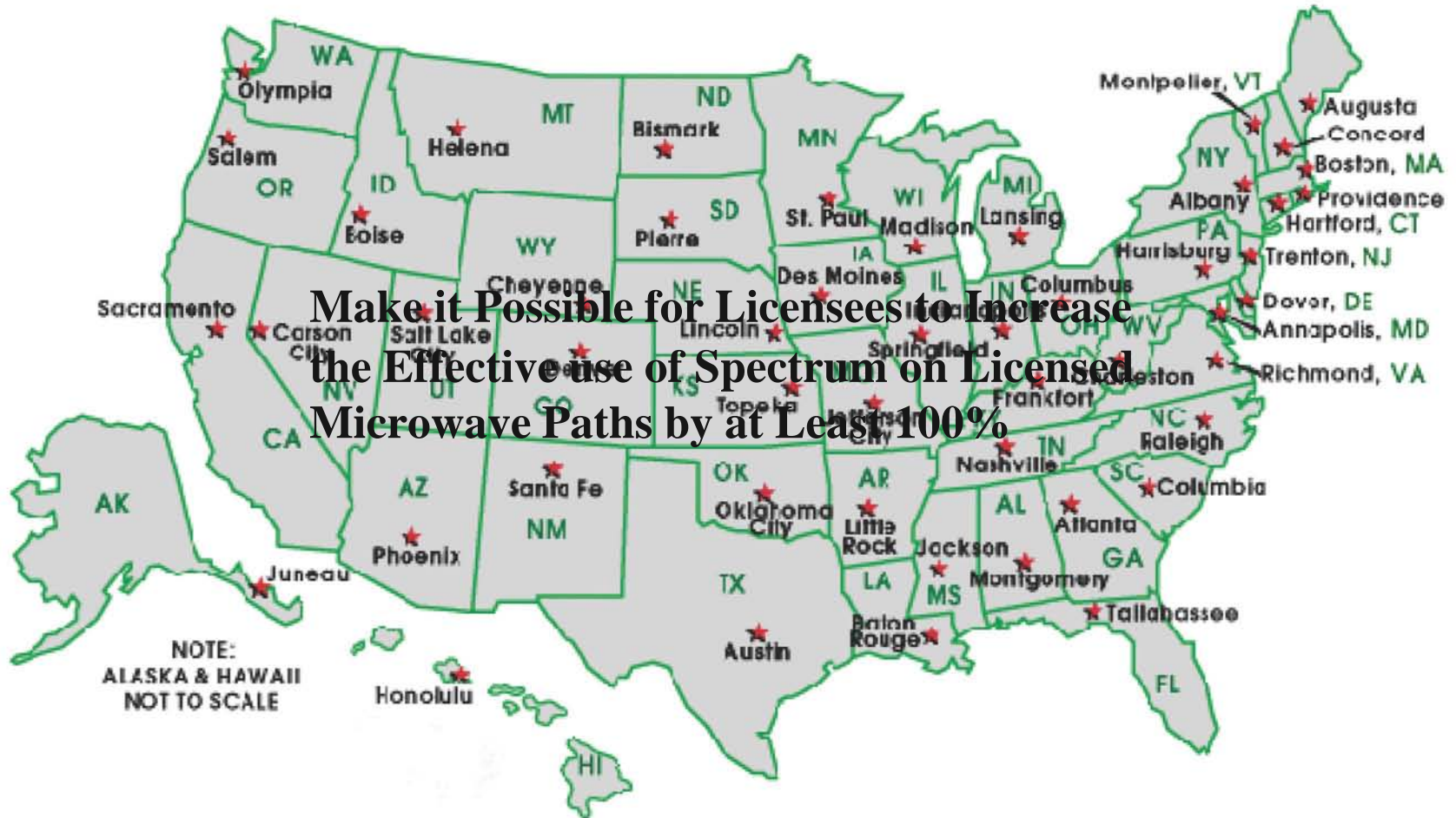
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**WSI requests an Immediate Ruling that DREs can be deployed around licensed microwave stations on the following conditions:**

1. The DREs are secondary to the licensed path (i.e., they must not cause and must accept harmful interference).
2. The addition of DREs around a licensed station is considered a major change to a license.
3. As required by Rule 101.103 and consistent with existing procedure, before deployment of one or more DREs the licensee must coordinate the proposed DREs by studying the prospect for harmful interference, issuing a prior coordination notice (PCN) to frequency coordinators and allowing the coordinators thirty days to evaluate the potential for harmful interference.
4. Following existing coordination practice, a new applicant attempting to frequency coordinate a new path who predicts that interference from a **DRE would be greater than the interference from the DRE's licensed or proposed station**, can require the licensee or prior applicant to reduce the predicted interference to levels no higher than would be predicted from the DREs associated licensed/proposed station(s).



**An Immediate Ruling that DREs can be deployed around licensed microwave stations would:**



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# The Request for an Immediate Ruling

## Supports the Effective Management of Available Spectrum

“Hundreds of projects are dependent on our spectrum. Because there is an imbalance of spectrum and demand for it, effectively the available spectrum is issued by the FCC and the

—Source: FCC, V



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# The Request for an Immediate Ruling Supports the Goals of the Commission



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### **Goals**

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1. Foster competition among different services.
2. Promote universal service, public safety, and service to individuals with disabilities.
3. Maximize efficient use of spectrum.
4. Develop a framework for analyzing market conditions for wireless services.
5. Minimize regulation where appropriate.
6. Facilitate innovative service and product offerings, particularly by small businesses and new entrants.
7. Serve WTB customers efficiently (including improving licensing, eliminating backlogs, disseminating information and making staff accessible).
8. Enhance consumer outreach and protection; improve enforcement process.

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that DREs can be deployed around  
licensed microwave stations.**

